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Counsel for Plaintiff Joel Ruiz

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

JOEL RUIZ, on behalf of himself and all others
similarly situated,

Plaintiff,

vs.

GAP, INC., and DOES 1-9 inclusive,

Defendants.

Case No. C-07-5739SC

**PLAINTIFF JOEL RUIZ'S INITIAL
DISCLOSURES**

Plaintiff Joel Ruiz, by his undersigned attorneys, submits his Initial Disclosures pursuant to Fed. R Civ. P. 26(a)(1).

I. Individuals Likely to Have Discoverable Information

Plaintiff Joel Ruiz believes that the following individuals are likely to have discoverable information that Plaintiff may use to support his claims:

<u>Name</u>	<u>Address</u>	<u>Information Possibly Known</u>
Joel Ruiz	May be contacted through Plaintiff's counsel.	Details regarding the employment application and the information that he provided to Defendant on their Employment Application website.

II. Description by Category of Documents Supporting Claims.

The following categories of documents are in the possession of Plaintiff and will be made available for inspection and copying upon request:

- Documents that Plaintiff may have received from Defendant regarding the loss of his personal information.
- Documents that Plaintiff may have received from Experian regarding the credit protection program that was coordinated by Defendant for Plaintiff and the putative class members.

III. Computation of Each Category of Damages Claimed by the Disclosing Party.

1. *Compensatory Damages:* At this juncture, without the benefit of discovery, the quantity of damages and its manner of computation is premature to determine with specificity. Notwithstanding the foregoing, Plaintiff and the putative class seek the establishment of a fund to cover uninsured identity theft loss that Plaintiff and the putative class may incur as a result of the complained-of conduct. Plaintiff and the putative class seek an upgrade of the current Triple Advantage Monitoring Plan offered to Plaintiff and the Class by increasing the amount of identity theft insurance to \$50,000 and to a period of five years.
2. *Legal and Equitable Relief:* At this juncture, without the benefit of discovery, the quantity of legal and equitable damages and its manner of computation is premature to determine with any further specificity.
3. *Reasonable Costs and Expenses:* At this juncture, without the benefit of discovery, the quantity of damages and its manner of computation is premature to determine with specificity. Notwithstanding the foregoing, Plaintiff seeks all reasonable attorney's fees, costs, and expenses incurred by Plaintiff's counsel in the prosecution of this action.

1 Dated: February 15, 2007

Respectfully submitted,

2 **FINKELSTEIN THOMPSON LLP**

3 /s/ Mark Punzalan

4 Mark Punzalan

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